

1 BARRY J. PORTMAN
2 VARELL L. FULLER
3 Assistant Federal Public Defender
4 160 West Santa Clara Street, Suite 575
5 San Jose, CA 95113
6 Telephone: (408) 291-7753
7
8 Counsel for Defendant WINSKOWSKI

FILED

NOV 23 2011

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA
9 SAN JOSE DIVISION

10 UNITED STATES OF AMERICA,) No. CR 11-00143-DLJ
11 vs. Plaintiff,) STIPULATION AND [PROPOSED]
12 JUVINNA WINSKOWSKI,) ORDER CONTINUING HEARING DATE
13 Defendants.) ON DEFENSE MOTION FOR
14 RECONSIDERATION OF BOND
15 _____) Hon. Howard. R. Lloyd

16
17 STIPULATION

18 The parties, by and through their respective counsel, hereby stipulate and jointly request
19 that the hearing date currently set in this matter for Thursday December 1, 2011, at 1:30 p.m., be
20 continued to Wednesday, December 14, 2011, at 1:30 p.m.

21 Counsel for Ms. Winskowski previously requested this matter be placed on calendar on
22 December 1, 2011, for a hearing on a defense motion to reopen the detention hearing based on
23 changed circumstances, and set conditions releasing the defendant to a residential drug treatment
24 facility. Defense counsel requires additional time to prepare and submit arguments in support of
25 the defense motion for reconsideration of bond, and therefore respectfully request a continuance
26 of the hearing date to December 14, 2011, at 1:30 p.m.

1 Accordingly, the parties therefore respectfully request that the Court continue the hearing
2 date previously set on December 1, 2011, at 1:30 a.m. to December 14, 2011, at 1:30 p.m.

Dated: November 17, 2011

/s/
VARELL L. FULLER
Assistant Federal Public Defender

Dated: November 17, 2011

/s/
ALLISON MARSTON DANNER
Assistant United States Attorney

PROPOSED ORDER

Good cause appearing and by stipulation of the parties, it is hereby ORDERED that the hearing on the defense motion for reconsideration of bond previously set for Thursday, December 1, 2011, is continued to Wednesday, December 14, 2011, at 1:30 p.m.

IT IS SO ORDERED.

16 Dated: November 23, 2011

~~THE HON. HOWARD R. LLOYD~~
United States Magistrate Judge